

**Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

**Revision of the Commission's Rules To
Ensure Compatibility With Enhanced 911
(E911) Emergency Calling Systems**

CC Docket 94-102

To: Wireless Telecommunications Bureau

**SUPPLEMENT TO REQUEST FOR A LIMITED WAIVER
AND EXTENSION OF THE COMMISSION'S PHASE II E911 RULES**

Northeast Communications of Wisconsin, Inc. dba Cellcom, by counsel and pursuant to 47 C.F.R. § 1.925, hereby supplements its request for a limited waiver and extension of the 47 C.F.R. § 20.18(g)(1)(v) Phase II enhanced 911 (E911) requirement that Tier III carriers achieve a location-capable handset penetration rate among its subscribers of at least 95% by December 31, 2005 ("95% subscriber penetration requirement") that was filed on August 31, 2005 with two (2) additional letters of support from Public Safety Answering Points (PSAP) (attached hereto).

Respectfully submitted,
NORTHEAST COMMUNICATIONS OF
WISCONSIN, INC. DBA CELLCOM



Thomas Gutierrez
Todd Slamowitz

Lukas, Nace, Gutierrez & Sachs, Chartered
1650 Tysons Boulevard, Suite 1500
McLean, VA 22102
703-584-8678

Its Attorneys

November 4, 2005



WAUPACA COUNTY SHERIFF'S OFFICE

1402 East Royalton Street
Waupaca, WI 54981

received 9-6-05

August 23, 2005

Larry L. Lueck
Cellcom
P.O. Box 19079
Green Bay, WI 54307-9079

Dear Mr. Lueck:

Thank you for the letter you sent updating us on where Cellcom stands in bringing wireless E911 service to the residents of our county and where Cellcom stands with the federal E911 rules.

As an initial matter, we appreciate your commitment and ability to meet the mandated deadline (e.g. six months from receiving a valid PSAP request) in delivering Phase II information to us with respect to your customers that already have location-capable handsets.

With respects to the Federal Communications Commission's (FCC) Phase II enhanced 911 (E911) requirement that Tier III carriers, such as Cellcom, achieve a location-capable handset penetration rate among its subscribers of at least 95% by December 31, 2005 (47 C.F.R. § 20.18(g)(1)(v)), we support your request for a waiver.

We understand the difficulties you face as you transition your remaining customers to location-capable handsets, especially those customers that continue to operate on your analog network. For that matter, we do not object to your request before the FCC.

We look forward to working with you as we deploy Phase II E911 service in our county and bring this valuable service to our residents.

Sincerely,

Gary Hesche



SHAWANO COUNTY SHERIFF'S DEPARTMENT
405 N. Main Street Shawano WI 54166

SHERIFF R.A. "BOB" SCHMIDT

LT. JOHN GUTHO
Admin. – 715-526-7905
Dispatch – 715-526-3111
FAX – 715-524-5181

STEVE CONRADT
Chief Deputy



STEVE BORROUGHS
Jail Administrator
Jail – 715-526-7950
FAX – 715-526-3070

August 23, 2005

Larry L. Lueck
Cellcom
PO Box 19079
Green Bay, WI 54307-9079

Dear Mr. Lueck:

Thank you for the letter you sent updating us on where Cellcom stands in bringing wireless E911 service to the residence of our county and where Cellcom stands with the federal E911 rules.

As an initial matter, we appreciate your commitment and ability to meet the mandated deadline (e.g. six months from receiving a valid PSAP request) in delivering Phase II information to us with respect to your customers that already have location-capable handsets.

With respects to the Federal Communication Commission's (FCC) Phase II enhanced 911 (E911) requirement that Tier III carriers, such as Cellcom, achieve a location-capable handset penetration rate among its subscribers of at least 95% by December 31, 2005 (47 C.F.R. § 20.18(g)(1)(v)), we support your request for a waiver.

We understand the difficulties you face as you transition your remaining customers to location-capable handsets, especially those customers that continue to operate on your analog network. For that matter, we do not object to your request before the FCC.

We look forward to working with you as we deploy Phase II E911 service in our county and bring this valuable service to our residents.

Sincerely,
Shawano County Sheriff's Department

A handwritten signature in black ink, appearing to read "William Mott", is written over the typed name and title.

William Mott
Communications Sergeant